

1 PHILLIP A. TALBERT
Acting United States Attorney
2 JUSTIN L. LEE
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
5 Attorneys for Plaintiff
United States of America
6
7

8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 JUAN CARLOS MARTINEZ CASTRO, and
SHANNON JEFFRIES,
15 Defendants.
16

CASE NO. 2:19-CR-00233-TLN
STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER
DATE: May 27, 2021
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

17 **STIPULATION**

- 18 1. By previous order, this matter was set for status on May 27, 2021.
19 2. By this stipulation, the defendants now move to continue the status conference until
20 August 26, 2021, at 9:30 a.m., and to exclude time between May 27, 2021, and August 26, 2021, under
21 Local Code T4.
22 3. The parties agree and stipulate, and request that the Court find the following:
23 a) Counsel for defendants desire additional time consult with their clients, review the
24 discovery, conduct defense investigation and research, discuss potential resolution, and
25 otherwise prepare for trial.
26 b) Counsel for defendants believe that failure to grant the above-requested
27 continuance would deny them the reasonable time necessary for effective preparation, taking into
28 account the exercise of due diligence.

1 c) The government does not object to the continuance.

2 d) Based on the above-stated findings, the ends of justice served by continuing the
3 case as requested outweigh the interest of the public and the defendant in a trial within the
4 original date prescribed by the Speedy Trial Act.

5 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
6 et seq., within which trial must commence, the time period of May 27, 2021 to August 26, 2021,
7 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
8 because it results from a continuance granted by the Court at defendant's request on the basis of
9 the Court's finding that the ends of justice served by taking such action outweigh the best interest
10 of the public and the defendant in a speedy trial.

11 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
12 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
13 must commence.

14 IT IS SO STIPULATED.

15
16 Dated: May 19, 2021

PHILLIP A. TALBERT
Acting United States Attorney

17
18 /s/ JUSTIN L. LEE
JUSTIN L. LEE
19 Assistant United States Attorney

20
21 Dated: May 19, 2021

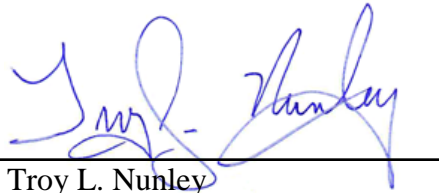
/s/ HANNAH LABAREE
HANNAH LABAREE
22 Counsel for Defendant
JUAN CARLOS MARTINEZ CASTRO

23
24 Dated: May 19, 2021

/s/ CHRIS COSCA
CHRIS COSCA
25 Counsel for Defendant
SHANNON JEFFRIES

1 **FINDINGS AND ORDER**

2 IT IS SO FOUND AND ORDERED this 20th day of May, 2021.

3
4
5 

6 Troy L. Nunley
7 United States District Judge
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28